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UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROHAN SANDEEP RANE, ET AL.,
COLLIN JOHN THOMAS WALKER,

Defendant.

No. CR 25-40-HDV

[PROPOSED] PROTECTIVE ORDER
REGARDING PRIVACY OF CHILD VICTIM
INFORMATION AND PERSONALLY
IDENTIFYING INFORMATION

The Court having considered the stipulation of the parties filed on February 26, 2025, with respect to the disclosure of information in discovery in this matter and good cause appearing, the Court hereby ORDERS as follows:

1. To permit the government to provide discovery material to defense counsel (hereinafter "Discovery") while avoiding the unauthorized dissemination of child victim/witness information or personally identifying information contained or referenced in the discovery material (hereinafter "PROTECTED MATERIALS"), the Discovery

1 that is produced will be subject to this Protective Order designed to
2 protect the PROTECTED MATERIALS from inadvertent or unauthorized
3 disclosure, which disclosure the government believes could violate 18
4 U.S.C. § 3509(d) or the protections afforded by Fed. R. Crim. P.
5 16(d).

6 2. The Protective Order will include any Discovery, that is,
7 written documentation, electronic data, and audio recordings provided
8 to the Defense Team, as defined below, including any copies of said
9 Discovery, which include, but are not limited to, paper or electronic
10 copies before or after the execution of the Protective Order.

11 3. For purposes of this Protective Order, the following terms
12 are defined:

13 a. "Defense Team" refers to defendant, his counsel of
14 record, any co-counsel specifically assigned to work on this case,
15 any defense paralegals, investigators, employees, experts, or
16 translators hired by the counsel of record for defendant to assist
17 counsel with this case. "Defense Team" includes any subsequent
18 counsel of record, should current counsel of record be relieved from
19 this case. "Defense Team" does not include family members and other
20 associates of defendant.

21 b. "Personal Identifying Information" ("PII") includes
22 any information that can be used to identify a person, including
23 name, address, date of birth, Social Security number, driver's
24 license number, telephone number, account number, or personal
25 identification number. The term "PII Protected Information" refers
26 to materials containing PII that the government produces to the
27 defense pursuant to the Protective Order.

1 c. "Protected Materials" includes any form of child
2 victim information or personally identifying information of the
3 victim, the victim's family, or a cooperating witness. The Protective
4 Order will include any discovery relating to the PROTECTED MATERIALS,
5 that is, written documentation, electronic data, photographs and
6 audio and/or video recordings provided to the Defense Team, as
7 defined below, including any information contained therein and any
8 copies of said discovery, which include, but are not limited to,
9 paper or electronic copies before or after the execution of the
10 Protective Order.

11 4. Defendant and his attorney are required to give a copy of
12 this Protective Order to all individuals outside defense counsel's
13 office engaged or consulted by defense counsel in preparation of the
14 trial in this case. Said individuals must agree in writing to be
15 bound by the terms of this Protective Order before receiving any of
16 the PROTECTED MATERIALS in connection with this case. The Defense
17 Team will keep a list of all individuals who have agreed in writing
18 to be bound by the terms of this Protective Order, which list may be
19 disclosed upon order of the Court in the event that the Court is
20 asked to determine whether a possible breach of the terms of the
21 Protective Order has occurred.

22 5. The Defense Team is prohibited from directly or indirectly
23 providing access to, or otherwise disclosing the contents of,
24 PROTECTED MATERIALS to anyone not working on the defense of this
25 criminal case, or otherwise making use of the materials in a manner
26 unrelated to the defense of this criminal case. For example, family
27 members and other associates of defendant would not be permitted to
28

1 receive or review copies of the PROTECTED MATERIALS disclosed by the
2 government unless such disclosure is carried out pursuant to the
3 terms of the Protective Order and the parties' stipulation.

4 6. The attorney of record and members of the Defense Team may
5 display and review the PROTECTED MATERIALS with the defendant. The
6 attorney of record and members of the defense team acknowledge that
7 providing copies of the PROTECTED MATERIALS to defendant or other
8 persons is prohibited, and agree not to duplicate or provide copies
9 of the PROTECTED MATERIALS to defendant or other persons.

10 7. The Defense Team shall maintain all PROTECTED MATERIALS
11 received from the government in a manner consistent with the terms of
12 this Protective Order. PROTECTED MATERIALS produced to the defense
13 shall be stored by the Defense Team in a secure manner in the defense
14 team's offices, homes, vehicles, or personal presence. Electronic
15 materials produced to the defense and printouts obtained from
16 electronic materials shall be handled in the same manner.

17 8. Any item that references the content of the PROTECTED
18 MATERIALS that is filed with the Court in connection with pre-trial
19 motions, trial, sentencing, or other matter before this Court, shall
20 be filed under seal and shall remain sealed until otherwise ordered
21 by this Court, pursuant to 18 U.S.C. § 3509(d) and/or Fed. R. Crim.
22 P. 16(d).

23 9. The Defense Team shall not transfer, disseminate, or send
24 any of the Discovery produced by the government outside of the United
25 States, except after complying with the procedures below. The
26 parties agree that the Discovery will not be transferred,
27 disseminated, or sent outside the United States by the Defense Team
28

1 without defendant's counsel of record (1) providing the government
2 with ten days written advance notice of the Defense Team's intention
3 to send any Discovery outside the United States and (2) obtaining a
4 written order from this Court (based upon a regularly-noticed motion)
5 that specifically authorizes the Defense Team to transfer,
6 disseminate, or send any of the Discovery outside the United States.
7 The Defense Team shall use materials designated subject to the
8 protective order only for the preparation and litigation of this
9 matter, and for no other purpose. Litigation of this matter includes
10 any appeal filed by the defendant, and any motion filed by the
11 defendant pursuant to 28 U.S.C. § 2255. Upon the final disposition
12 of this case, any materials designated subject to the protective
13 order shall not be used, in any way, in any other matter, absent a
14 court order. All materials designated subject to the protective
15 order maintained in the Defense Team's files shall remain subject to
16 the protective order unless and until such order is modified by this
17 Court. Upon the conclusion of appellate and post-conviction
18 proceedings, and upon the consent of defendant, the Defense Team
19 shall return the discovery or certify that the discovery has been
20 destroyed.

21 IT IS SO ORDERED.

22 Dated: 03/03/25
23



24 THE HONORABLE HERNÁN D. VERA
25 UNITED STATES DISTRICT JUDGE

26 Presented by:

27 /s/ Catharine Richmond

28 CATHARINE A. RICHMOND

Assistant United States Attorney